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ATTORNEYS FOR DEFENDANTS MENZIES AVIATION, INC.

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

ANSELMO ESTRADA, an individual,

PLAINTIFF,

v.

MENZIES AVIATION, INC., A  
DELAWARE CORPORATION; and DOES 1-  
50, inclusive,

DEFENDANTS.

CASE No: 3:11-cv-02188-EMC

**STIPULATION TO CONTINUE  
HEARINGS ON MENZIES AVIATION,  
INC.'S MOTION FOR LEAVE TO FILE  
FIRST AMENDED ANSWER AND  
MOTION FOR LEAVE TO FILE  
COUNTERCLAIM ; ORDER**

ORIGINAL COMPLAINT FILED:

APRIL 1, 2011

DATE REMOVED FROM STATE COURT:

MAY 4, 2011

CURRENT DATE: APRIL 13, 2012

TIME: 1:30 PM

LOCATION: 450 GOLDEN GATE AVE, SAN  
FRANCISCO, CA

PROPOSED DATE: APRIL 27, 2012

JUDGE: EDWARD M. CHEN

1 Plaintiff Anselmo Estrada (hereinafter referred to as "Plaintiff"), pro se, and  
2 Defendant Menzies Aviation, Inc., (hereinafter referred to as "Defendant"), by and  
3 through its counsel of record, hereby agree and stipulate as follows:

4 WHEREAS on March 2, 2012, Defendant filed its Unopposed Motion for  
5 Leave to File First Amended Answer.

6 WHEREAS on March 2, 2012, Defendant filed its Motion for Leave to File  
7 a Counterclaim for Fraud in the Inducement.

8 WHEREAS both motions are currently scheduled for hearing on April 13,  
9 2012, at 1:30 P.M., before the Honorable Judge Edward M. Chen.

10 WHEREAS on April 9, 2012, Plaintiff informed Defendant that he has  
11 bronchitis and will be unable to attend the hearing as scheduled.

12 WHEREAS Plaintiff currently believes that he will be unable to attend the  
13 hearings on Defendant's Unopposed Motion for Leave to File First Amended  
14 Answer and Motion for Leave to File a Counterclaim for Fraud in the Inducement,  
15 as currently scheduled.

16 **IT IS HEREBY STIPULATED AND AGREED:**

17 1. The hearing on Defendant's Unopposed Motion for Leave to File First  
18 Amended Answer shall be continued to April 27, 2012, at 1:30 PM, or the first  
19 available date on the Court's calendar thereafter.

20 2. The hearing on Defendant's Motion for Leave to File a Counterclaim  
21 for Fraud in the Inducement shall be continued to April 27, 2012, at 1:30 PM, or  
22 the first available date on the Court's calendar thereafter.

23 IT IS SO STIPULATED

24 //

25 //

26 //

27 //

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1 Plaintiff Anselmo Estrada (hereinafter referred to as "Plaintiff"), pro se, and  
2 Defendant Menzies Aviation, Inc., (hereinafter referred to as "Defendant"), by and  
3 through its counsel of record, hereby agree and stipulate as follows:

4 WHEREAS on March 2, 2012, Defendant filed its Unopposed Motion for  
5 Leave to File First Amended Answer.

6 WHEREAS on March 2, 2012, Defendant filed its Motion for Leave to File  
7 a Counterclaim for Fraud in the Inducement.

8 WHEREAS both motions are currently scheduled for hearing on April 13,  
9 2012, at 1:30 P.M., before the Honorable Judge Edward M. Chen.

10 WHEREAS on April 9, 2012, Plaintiff informed Defendant that he has  
11 bronchitis and will be unable to attend the hearing as scheduled.

12 WHEREAS Plaintiff currently believes that he will be unable to attend the  
13 hearings on Defendant's Unopposed Motion for Leave to File First Amended  
14 Answer and Motion for Leave to File a Counterclaim for Fraud in the Inducement,  
15 as currently scheduled.

16 **IT IS HEREBY STIPULATED AND AGREED:**

17 • The hearing on Defendant's Unopposed Motion for Leave to File First  
18 Amended Answer shall be continued to April 27, 2012, at 1:30 PM, or the first  
19 available date on the Court's calendar thereafter.

20 • The hearing on Defendant's Motion for Leave to File a Counterclaim for  
21 Fraud in the Inducement shall be continued to April 27, 2012, at 1:30 PM, or the  
22 first available date on the Court's calendar thereafter.

23 **IT IS SO STIPULATED**

24  
25 DATE: APRIL 12, 2012

26  
27 By: 

28 ANSELMO ESTRADA

1 DATE: APRIL 12, 2012

3 By:

4 ANSELMO ESTRADA  
5 PRO SE

6 DATE: APRIL 12, 2012

7 FOLEY & LARDNER LLP  
8 JOHN H. DOUGLAS  
9 CHRISTOPHER G. WARD  
10 NAN CHEN

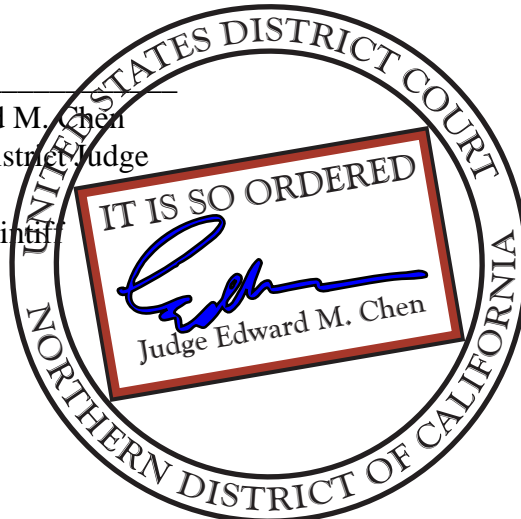
11 By: /s/ Nan Chen

12 NAN CHEN  
13 ATTORNEYS FOR DEFENDANTS MENZIES  
14 AVIATION, INC.

15 IT IS SO ORDERED:

16 Edward M. Chen  
17 U.S. District Judge

18 cc: Plaintiff



**PROOF OF SERVICE**

I am employed in the **County of San Francisco, State of California**. I am over the age of 18 and not a party to this action; my current business address is **555 California Street, Suite 1700, San Francisco, CA 94104-1520**.

On **April 12, 2012**, I served the foregoing document(s) described as: **STIPULATION TO CONTINUE HEARINGS ON MENZIES AVIATION, INC.'S MOTION FOR LEAVE TO FILE FIRST AMENDED ANSWER AND MOTION FOR LEAVE TO FILE COUNTERCLAIM** on the interested party(s) in this action as follows:

☒ BY THE FOLLOWING MEANS:

I placed an original enclosed in sealed envelope(s) addressed as follows:

Anselmo A. Estrada  
2863 – 23<sup>rd</sup> Street  
San Francisco, CA 94110

☒ BY MAIL

☒ I am readily familiar with the firm's practice of collection and processing correspondence for mailing with the United States Postal Service; the firm deposits the collected correspondence with the United States Postal Service that same day, in the ordinary course of business, with postage thereon fully prepaid, at **San Francisco, California**. I placed the envelope(s) for collection and mailing on the above date following ordinary business practices.

☒ Executed on **April 12, 2012**, at **San Francisco, California**.

☒ I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

/s/ Laura Lee  
Laura Lee